

Roger A Wright, SBA #014150  
**WRIGHT LAW FIRM, PLC**  
3532 E Cotton Court  
Gilbert, Arizona 85234  
(480) 558-1700  
office@wrightlawaz.com  
*Attorney for Defendant*  
*Barrett Financial Group, LLC*

**THE UNITED STATES DISTRICT COURT**  
**DISTRICT OF ARIZONA**

Bonnie Creech,

Plaintiff,

vs.

Barrett Financial Group, L.L.C.; Broker  
Solutions, Inc., dba Kind Lending, Kind  
Lending, L.L.C.; John Claude Hegglin, an  
individual, and as an agent of Barrett Financial  
Group, L.L.C., Broker Solutions, Inc., dba  
Kind Lending; and Kind Lending L.L.C.; and  
Jane and John Doe employees 1-10.

Defendants

Case No.: CV-22-00871-PHX-SMB

**NOTICE OF CERTIFICATION OF  
CONFERRAL**

Defendant Barrett Financial Group, LLC certify that it has complied with LRCiv. 7.1 requiring a party planning to file a motion to dismiss to confer with Plaintiffs' counsel to determine if the defect can be cured by filing an amended pleading to avoid the need for the motion. Defendant hereby notifies the Court that a conference was held between Defendant and Plaintiff's counsel to discuss whether an amendment could cure a deficient pleading.

Counsel were unable to reach an agreement that would avoid the necessity for Barrett Financial Group to file a motion to dismiss. Defendant's counsel believes that no amendment to Plaintiff's Complaint will cure the deficient pleading. Pursuant to Plaintiff's counsel's conduct and its

1 refusal to confer, Defendant, Barrett Financial Group will be filing its Motion to Dismiss from the  
2 above-captioned matter.

3 RESPECTFULLY SUBMITTED this 30th day of September 2022.

4 **WRIGHT LAW FIRM, PLC**

5  
6 By: /s/ Roger A. Wright

Roger A. Wright (AZ # 014105)

7 3532 E Cotton Court

8 Gilbert, Arizona 85234

Telephone: (480) 558-1700

9 [office@wrightlawaz.com](mailto:office@wrightlawaz.com)

Counsel for Barrett Financial Group, LLC.

**CERTIFICATE OF SERVICE**

I certify that, on September 30, 2022, I filed the foregoing Barrett Financial Group's

**NOTICE OF CERTIFICATION OF CONFERRAL**

via the Court's electronic filing system.

The Court's electronic filing system will provide notice and a copy of this filing to the following electronic filing registrants:

Christine Anderson Ferraris  
Stephen Weeks  
A. FERRARIS LAW, PLLC  
333 N. Wilmot, Suite 340  
Tucson, Arizona 85711  
[cferraris@aferrarislaw.com](mailto:cferraris@aferrarislaw.com)  
[sweeks@aferrarislaw.com](mailto:sweeks@aferrarislaw.com)  
*Counsel for Plaintiff*

Anelisa Benavides  
David Edward Funkhouser, III  
SPENCER FANE LLP  
2415 E Camelback Rd., Ste. 600  
Phoenix, AZ 85016-4251  
602-333-5464  
[abenavides@spencerfane.com](mailto:abenavides@spencerfane.com)  
[dfunkhouser@spencerfane.com](mailto:dfunkhouser@spencerfane.com)  
*Counsel for Defendant*  
*Broker Solutions, Inc. dba*  
*Kind Lending*

Robert Moon  
MOON LAW FIRM, PLC  
1423 S. Higley Road, Suite 112  
Mesa, Arizona 85206  
(480) 590-7359  
[robert@moonlawaz.com](mailto:robert@moonlawaz.com)  
*Attorney for Defendant*  
*John Hegglin*

*by/ Roger A. Wright*  
\_\_\_\_\_  
*Counsel for Defendant*  
*Barrett Financial Group, LLC*

